

ORIGINAL

EXHIBIT A

2 to 11/2

(9)
11/2

**DEFENDANTS' SECOND SET OF
INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS TO PLAINTIFF**

01-cv-1057

FILED
HARRISBURG, PA

NOV 27 2002

MARY E. DENDREA, CLERK
Per Sff
Deputy Clerk

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BARBARA A. WILHELM,
Plaintiff

v.

COMMONWEALTH OF PA.;
PENNSYLVANIA STATE POLICE;
COLONEL PAUL J. EVANKO,
COMMISSIONER; LIEUTENANT
COLONEL THOMAS K. COURY; and
CAPTAIN MICHAEL. D. SIMMERS,
Defendants

NO. 1:CV-01-1057

(JUDGE RAMBO)

**DEFENDANTS' SECOND SET OF INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF**

The definitions and instructions set forth in defendants' first set of interrogatories and first request for production of documents to plaintiff shall apply to these interrogatories and requests for production of documents.

1. Identify plaintiff's husband, his job and his employer.

RESPONSE:

2. Describe in detail the health care benefits plaintiff, her husband and their children receive through his employment. Include in your answer:
 - a. The nature of each benefit.
 - b. Identify the provider of each benefit.
 - c. Describe the coverage provided under each benefit.
 - d. State the terms under which each benefit is provided including co-pays, limitations on services, etc.

RESPONSE:

3. Identify each person plaintiff contacted and each person that contacted plaintiff about employment opportunities since October, 2001. For each person identified:

- a. Identify and describe the employment opportunity;
- b. State whether an interview was offered and indicate plaintiff's response;
- c. If an interview was held state the date on which it occurred and identify who conducted it;
- d. State whether employment was offered and indicate plaintiff's response.
- e. If employment was offered, state the salary of the position offered and describe all benefits as requested in interrogatory 2.

RESPONSE:

4. Has plaintiff asked for an evaluation of her qualifications by the Civil Service Commission? If the answer is yes,
- a. State the date(s) plaintiff requested an evaluation;
 - b. Identify all positions the Commission indicated plaintiff was qualified for without the need to take an examination;
 - c. Identify all positions for which the Commission indicated plaintiff was qualified to test; and
 - d. Identify all Civil Service examinations plaintiff has taken since her dismissal from the State Police and the date on which each examination was taken.

RESPONSE:

5. State whether plaintiff has seen a vocation counselor or otherwise sought assistance in seeking employment. Describe plaintiff's efforts in this regard.

RESPONSE:

6. Produce all documents describing the health care benefits plaintiff and her family receive through her husband's employment.

RESPONSE:

7. Produce all documents related to plaintiff's search for employment following her dismissal from the Pennsylvania State Police. Include letters of inquiry to prospective employers, plaintiff's resumes, all correspondence or communications from prospective employers, notes of interviews, job postings, job descriptions, advertisements, etc. Defendants note that they previously asked for similar documentation, which was never produced. See Defendants' First Set of Interrogatories #2.

RESPONSE:

8. Produce plaintiff's state and federal income tax returns and attachments for the year 2000 and all subsequent years. If plaintiff has filed joint returns produce those returns. Defendants note that they previously asked for this documentation which was never produced. See Defendants' First Request for Production of Documents, #6.

RESPONSE:

9. Describe any training or course work plaintiff has taken since her dismissal to enhance her employability. Include in your answer,


- a. The name of each training or course;
- b. Identify who provided each training or course;
- c. Describe the substance of each training or course; and
- d. State the number of hours spent in each training or course.

RESPONSE:

10. State why plaintiff believes she has not been successful in obtaining employment since her dismissal and identify all of the facts on which she bases her belief. If her belief is based in any way on documents, produce those documents.

RESPONSE:

D. MICHAEL FISHER
Attorney General

BY: 
SUSAN J. FORNEY
Chief Deputy Attorney General
I.D. No. 27744

Office of Attorney General
Litigation Section
15th Floor, Strawberry Square
Harrisburg, PA 17120
(717) 787-9831 - Direct
(717) 772-4526 - Fax

DATED: November 5, 2002

CERTIFICATE OF SERVICE

I, **SUSAN J. FORNEY**, Chief Deputy Attorney General for the Commonwealth of Pennsylvania, hereby certify that on November 5, 2002, I caused to be served a copy of the foregoing document entitled **Defendants' Second Set of Interrogatories and Request for Production of Documents to Plaintiff**, by depositing same in the United States Mail, first class, postage prepaid, in Harrisburg, Pennsylvania upon the following:

**Nathan C. Pringle, Jr., Esquire
3601 N. Progress Avenue, Suite 200
Harrisburg, PA 17110**

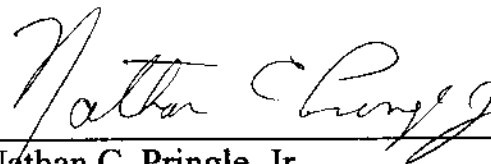


SUSAN J. FORNEY
Chief Deputy Attorney General

CERTIFICATE OF SERVICE

I, Nathan C. Pringle, Jr., hereby certify that on November 27, 2002, I caused to be delivered by first-class mail a copy of the foregoing document entitled Plaintiff's Brief in Opposition to Defendant's Motion to Expedite Plaintiff's Responses to Discovery, and served it on the following:

Susan J. Forney
Chief Deputy Attorney General
Office of Attorney General
Litigation Section
15th Floor, Strawberry Square
Harrisburg, PA 17120



Nathan C. Pringle, Jr.